

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Proposed Amendments to the Service Rules)	PS Docket No. 13-87
Governing Public Safety Narrowband Operations in)	
the 769-775/799-805 MHz Bands)	
)	
The Development of Operational, Technical and)	WT Docket No. 96-86
Spectrum Requirements for Meeting Federal, State)	
and Local Public Safety Communications)	
Requirements Through the Year 2010)	
)	
National Public Safety Telecommunications)	RM-11433
Council Petition for Rulemaking on Aircraft Voice)	
Operations at 700 MHz)	
)	
National Public Safety Telecommunications)	RM-11433
Council Petition for Rulemaking to Revise 700)	
MHz Narrowband Channel Plan)	
)	
Region 24 700 MHz Regional Planning)	WT Docket No. 96-86
Committee Petition for Rulemaking)	PS Docket No. 06-229
)	
State of Louisiana Petition for Rulemaking)	RM-11577

**COMMENTS BY
THE REGION 7 (COLORADO) REGIONAL PLANNING COMMITTEE
CONCERNING
THE SEVENTH REPORT AND ORDER
NOTICE OF PROPOSED RULEMAKING**

TABLE OF CONTENTS

I. INTRODUCTION AND EXECUTIVE SUMMARY	2
II. NOTICE OF PROPOSED RULEMAKING	2
A. December 31, 2016 Deadline for Narrowbanding Transition to 6.25 Kilohertz Bandwidth Technology	2
B. 2010 NPSTC Petition – Air-Ground Communications on Secondary Trunking Channels	4
C. 2008 NPSTC Petition – Proposed Revisions to 700 MHz Narrowband Channel Plan	4
1. Nationwide Interoperability Travel Channel.....	4
2. Tactical Voice Communications on Data Interoperability Channels	4
3. Reserve Channels	4
4. Power Limit for Low Power Channels	4
D. Miscellaneous Issues.....	4
1. Project 25 Compliance Assessment Program.....	4

2. ACP Requirements for Class B Signal Boosters	5
3. Narrowband Power Limits	5
4. Interoperability Network Access Code	5
5. User Access to Interoperability Channels	5
6. Analog Operation on the Interoperability Channels.....	5

I. INTRODUCTION AND EXECUTIVE SUMMARY

The Region 7 (Colorado) Regional Planning Committee (RPC) presents comments for the elimination of the mandatory transition deadline to operate the 700 MHz Public Safety Narrowband channels with a voice efficiency of at least one voice path per 6.25 kHz of spectrum bandwidth be eliminated completely and comments in regards to the various NPSTC proposals as invited by this “Notice of Proposed Rulemaking”.

II. NOTICE OF PROPOSED RULEMAKING

The Region 7 (Colorado) Regional Planning Committee (RPC) provides have met and discussed this “Notice of Proposed Rulemaking” offers these comments for consideration.

A. December 31, 2016 Deadline for Narrowbanding Transition to 6.25 Kiloherzt Bandwidth Technology

The Region 7 (Colorado) RPC recommends the mandatory transition deadline to operate the 700 MHz Public Safety Narrowband channels with a voice efficiency of at least one voice path per 6.25 kHz of spectrum bandwidth be eliminated completely or at least be modified from December 31, 2016 to a date not sooner than December 31, 2024.

Throughout the State of Colorado, the use of 700 MHz public safety narrowband voice spectrum is minimal as compared to the use of 800 MHz public safety narrowband voice spectrum; however the inclusion of 700 MHz public safety narrowband voice spectrum in current LMR systems is essential to their operational communications. This use of 700 MHz public safety narrowband voice spectrum has neither met, nor exceeded, any of the allocated 12.5 kHz narrowband voice channel allotments in any county-like area defined in or by The Region 7 (Colorado) 700 MHz RPC’s frequency plan. To date, The Region 7 (Colorado) RPC is not aware of any users intending to deploy large 700 MHz public safety narrowband voice systems beyond what is currently licensed in the region.

The underlying purpose of the rule(s) requiring more efficient uses of spectrum aim to increase the available “talk paths-per-megahertz” to either avoid or resolve spectrum congestion. Spectrum congestion is a clear issue in the bands below 512 MHz, and in that case, Region 7 believes that such rules are prudent, provide benefit the users of that spectrum and thus serve the public’s interest. However, in the 700 MHz public safety narrowband voice spectrum, Region 7 believes that there will not be a spectrum congestion issue in this band in the next ten-to-fifteen years. Therefore, we ardently believe that the timeline outlined in §90.535(d)(1), §90.535(d)(2) and §90.535(d)(3) of the Commission’s rules neither benefits the users of this spectrum, nor serves the public’s interest. In addition, since all Region 7 700 MHz public safety narrowband voice spectrum utilizes the TIA/EIA Project 25 phase one

(FDMA) common air interface standard, in order to comply with the Commission's rules we must utilize the TIA/EIA Project 25 phase two (TDMA) common air interface standard. As of this date, the TIA/EIA Project 25 phase two standard is not fully complete with Project 25 Compliance Assessment Program (CAP) tests. Additionally, there are not any Project 25 Compliance Assessment Program labs certified to perform TIA/EIA Project 25 phase two tests. Therefore The Region 7 (Colorado) licensees are left with the decision to purchase equipment from manufacturers which purports to be "Project 25 phase two upgradeable" or "capable". Because the standards and compliance assessment processes are not complete, none of this equipment is demonstrably compatible with this standard to fulfill the Commission's requirements. In order to meet the timeline set forth in the Commission's rules, a migration toward Project 25 phase two will need to begin almost immediately due to the high costs involved, as both mobile and repeater infrastructure equipment purchases will be required. This is a burdensome and risky decision to make with tax dollars, particularly when much of the equipment which will need to be replaced has not met or exceeded the serviceable equipment lifetime anticipated at the time it was purchased. For equipment purchases that purport to be "Project 25 phase two upgradeable" additional expenditures will be required to accomplish this upgrade to "Project 25 phase two". It is also noted that preliminary reports circulated within the public safety community indicate that a conversion from wideband to narrowband operation may result in a twenty percent (20%) reduction in coverage; adding further costs to the process of narrowbanding.

Within Region 7 the 700 MHz narrowband voice channels are part of LMR systems utilizing both 700 & 800 MHz frequencies. Many of these licenses are part of a statewide interoperable system or large municipal systems. The current narrow-banding mandate means that most of the agencies in Region 7, in addition to upgrading their infrastructure, must replace all of their subscriber units. This is proving to cost more than twice the amount necessary to simply upgrade the 700 MHz equipment. The requirement to upgrade the 700 MHz channels results in a requirement to upgrade 800 MHz infrastructure as well so that current 800 MHz users are not isolated from interoperable communications with the 700 MHz users or the coverage provide by 700 MHz infrastructure sites incorporated into the larger 700/800 MHz systems. The largest of these systems is a statewide P25 digital trunked system with 212 sites supporting over 1000 user agencies. The cost to upgrade this system infrastructure to be compatible with 6.25 kHz voice equivalency is over 12 Million plus at least 10 Million to upgrade the individual 700 MHz site infrastructure plus the cost for compatible subscriber units. Currently there is no funding mechanism for this upgrade. If funding can't be found the 700 MHz users may have to abandon their 700 MHz licenses and reduce their system coverage and/or capacities to what is provided by their 800 MHz LMR sites. This would have a significant negative impact on regional communications and not serve the public interest.

The Region 7 (Colorado) RPC would also recommend that the interim deadline of December 31,

2014 for manufacturers to cease marketing, manufacture, or import of 700 MHz narrowband equipment not capable of operating at 6.25 kilohertz efficiency not be amended. The Region 7 (Colorado) RPC believes that the requirement for the availability of equipment must allow for the full lifespan use of current equipment. For example, if a Public Safety Agency purchases a piece of equipment that is not capable of P25 phase two operation in December of 2014 and a narrowband deadline requiring use of “P25 phase two equipment” is set for December 31, 2020 the agency may not utilize the complete lifespan of that equipment but they would still obtain significant return on their investment.

B. 2010 NPSTC Petition – Air-Ground Communications on Secondary Trunking Channels

The Region 7 (Colorado) RPC does not oppose this NPSTC proposal.

C. 2008 NPSTC Petition – Proposed Revisions to 700 MHz Narrowband Channel Plan

1. Nationwide Interoperability Travel Channel

The Region 7 (Colorado) RPC has no objection to designating two of the four 6.25 kilohertz channel pairs as “Nationwide Interoperability Travel Channels”. The Region 7 (Colorado) RPC also believes that the designated travel channel should also remain available for use as a secondary command and control channel to Incident Commanders.

2. Tactical Voice Communications on Data Interoperability Channels

The Region 7 (Colorado) RPC does not feel that a secondary designation for tactical voice communications would have any adverse impact on primary data-only interoperability communications in Colorado.

3. Reserve Channels

The State of Colorado (a member of The Region 7 (Colorado) RPC) has procured temporary deployable mobile trunked infrastructure to be transported into an incident area to assist with emergency response and recovery. The Region 7 (Colorado) RPC agrees that designating channels for deployable trunked use would allow 700 MHz licensees to pre-program these channels into their subscriber radios, negating the need during a disaster to reprogram radios in the field or distribute cached radios, “both of which are time consuming and may be impossible depending upon the nature of the emergency. The Region 7 (Colorado) RPC also supports nationwide pre-designation of deployable trunking groups and compliance with ANSI/TIA-102 (Project 25) standards to promote interoperability across agencies.

4. Power Limit for Low Power Channels

The Region 7 (Colorado) RPC agrees that the two watt power limit for low power channels should be increased to 20 watts ERP to make these channels more functional allowing for more effective on-scene communications in critical life-safety situations. The Region 7 (Colorado) RPC also supports the maximum six meter above ground antenna height limit.

D. Miscellaneous Issues

1. Project 25 Compliance Assessment Program

The majority of P25 equipment users within Region 7 use P25 CAP certified equipment. Many have requirement for P25 CAP certification as a condition of purchasing P25 equipment. Requiring P25 CAP certification in our rules for 700 MHz narrowband equipment would enhance interoperability and competition in the equipment market by giving licensees more flexibility to choose

among competing vendors? As many P25 equipment users already require P25 CAP certification The Region 7 (Colorado) RPC does not believe the P25 CAP certification imposes any increased costs on vendors or licensees.

2. ACP Requirements for Class B Signal Boosters

The primary concern from The Region 7 (Colorado) RPC members is that Signal Boosters have been known to cause interference (primarily when they malfunction) in many of our larger capacity multi-site trunked systems. The Region 7 (Colorado) RPC also acknowledges that many jurisdictions have implemented building codes that require use of Signal Booster to insure public safety communications. With this in mind The Region 7 (Colorado) RPC trusts that the Commission will carefully evaluate this issue and its possible interference effect under these circumstances.

3. Narrowband Power Limits

The Region 7 (Colorado) RPC supports the use ERP limits from Section 90.545(b) in lieu of the TPO limits listed in Section 90.541 as favored by The Commission, the correction of the cross-reference in Section 90.541(a) to refer to paragraph (a) and the associated Table in Section 90.635 for power limits and antenna heights of base station transmitters, as well as deleting Section 90.545 in its entirety.

4. Interoperability Network Access Code

The Region 7 (Colorado) RPC supports the use of APCO/NPSTC ANS 1.104.1-2010 for any radio unit designed to operate on the interoperability channels at 700 MHz. The APCO/NPSTC ANS 1.104.1-2010 standard addresses the assignment of a pre-programmed digital address, called a Network Access Code (NAC), and the use of multiple NACs as needed at the site of an incident.

5. User Access to Interoperability Channels

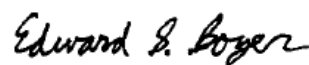
The Region 7 (Colorado) RPC supports the rule specifying radios have the capability of being programmed to operate on all of the sixty-four of the 6.25 kilohertz bandwidth interoperability channels in the 700 MHz band. The Region 7 (Colorado) RPC Regional Plan was written and accepted with the regional requirement specifying which of the sixty-four of the 6.25 kilohertz bandwidth interoperability channels would actually be required to be programmed into radios operating on 700 MHz Licenses. The Region 7 (Colorado) RPC believes that the RPC should retain or assign this responsibility within its Regional Plan.

6. Analog Operation on the Interoperability Channels

The Region 7 (Colorado) RPC feels that analog operation on the interoperability channels on a secondary basis should be an option available to RPCs for inclusion within their Regional Plans. The Region 7 (Colorado) RPC strongly feels that this should be managed at a regional level, however The Region 7 (Colorado) RPC also believes that CTCSS tone standards used on other interoperability channels should be utilized with the secondary usage of analog operation to maximize interoperability.

June 13, 2013

Respectfully submitted,



Edward S. Boyer, Chair
FCC Region 7 (Colorado)
700 MHz Regional Planning Committee
601 E. 18th Ave., Suite 250
Denver, Colorado 80203